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twenty-five (25) in accordance with local rules and federal rules.

- (d) Maximum number of requests for admissions by each party to another party shall be forty (40).
- (e) Maximum number of depositions by each party shall be five (5).
- (f) Depositions shall be limited to **seven (7) hours** in length consistent with Fed. R. Civ. P. 30(d)(1).
- (g) Reports from retained experts under Rule 26(a)(2) are due during the discovery period:

From Plaintiff by **May 15, 2021**.

From Defendants **June 15, 2021**.

- (h) The parties do not believe that this case is suitable for electronic discovery but are amenable to producing discoverable electronically stored information in hard copy or in .pdf format as an initial matter. Once the parties have had the opportunity to review such documents, the parties agree, if necessary, to confer amongst themselves regarding any additional exchange or production that the parties believe is necessary.
- (i) The parties anticipate that there will be a need for a protective order in this matter.

4. **Other Items:**

- (a) The parties do not anticipate a need to meet with the court before a scheduling order is entered.
- (b) The parties defer to the Court's availability and scheduling preferences regarding any non-final or final Rule 16 pretrial conferences.
- (c) Plaintiff should be allowed until **February 1, 2021** to request leave to join

additional parties or amend pleadings.

- (d) Defendants should be allowed until **February 15, 2021** to request leave to join additional parties or amend pleadings.
- (e) Dispositive motions shall be filed on or before **August 16, 2021**.
- (f) The parties believe there is a possibility for settlement. Plaintiff has not yet made an initial demand to Defendants but anticipates doing so within 14 days.
- (g) The parties believe that mediation may enhance settlement prospects. Mediation should be conducted prior to the close of the discovery period, with the exact date to be set by the mediator after consultation with the parties. The parties agree that the mediator shall be **Rene S Trehy**.
- (h) Final dates for submitting Rule 26(a)(3) witness lists, designations of witnesses whose testimony will be presented by deposition, and exhibit lists shall be in accordance with the local rules.
- (i) Final dates to file objections under Rule 26(a)(3) shall be in accordance with the local rules.
- (j) Suggested trial date November 1, 2021: Trial of this action is expected to take approximately 1-4 days. A jury trial has been demanded.
- (k) ARS filed a Motion to Dismiss on November 24, 2020 (ECF No. 14). Plaintiff filed a Memorandum in Opposition to ARS' Motion to Dismiss on December 16, 2020 (ECF No. 18). The Court has not yet ruled on the Motion to Dismiss.

Date: December 21, 2020

/s/ Chad Diamond

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Date: December 21, 2020

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Date: December 21, 2020

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